

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	
STEPHEN GRAY, individually and on	:
behalf of all others similarly situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES PRINCE,	:
THE PLANS ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP INC.,	:
THE 401(k) INVESTMENT	:
COMMITTEE, and JOHN DOES 1 - 20,	:
	:
Defendants.	:
-----X	
SHAUN ROSE, Individually and On	:
Behalf of All Others Similarly Situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES PRINCE,	:
THE PLANS ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP INC.,	:
THE 401(k) INVESTMENT	:
COMMITTEE, and JOHN DOES 1 - 10,	:
	:
Defendants.	:
-----X	
MEREDITH TRANBERG, individually	:
and on behalf of all others similarly situated	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES PRINCE,	:
THE PLANS ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP INC.,	:
THE 401(k) INVESTMENT	:
COMMITTEE, and JOHN DOES 1 - 20,	:
	:
Defendants.	:
-----X	

Civil Action No: 07 Civ. 9790 (SHS)

Civil Action No: 07 Civ. 10294

Civil Action No: 07 Civ. 10341

-----X	
ANTON RAPPOLD, individually and on	:
behalf of all others similarly situated,	:
	:
Plaintiff,	:
	:
v.	:
	:
CITIGROUP INC., CITIBANK, N.A.,	:
CHARLES PRINCE, THE PLANS	:
ADMINISTRATIVE COMMITTEE OF	:
CITIGROUP INC., THE 401(k)	:
INVESTMENT COMMITTEE, and JOHN	:
and JANE DOES 1 - 10,	:
	:
Defendants.	:
-----X	

Civil Action No: 07 Civ. 10396

-----X	
SAMIER TADROS, on Behalf of All	:
Others Similarly Situated,	:
	:
Plaintiff,	:
	:
v.	:
	:
CITIGROUP INC., CHARLES O.	:
PRINCE, C. MICHAEL ARMSTRONG,	:
ALAIN J.P. BELDA, GEORGE DAVID,	:
KENNETH T. DERR, JOHN M. DEUTCH,	:
ROBERTO HERNANDEZ RAMIREZ,	:
ANN DIBBLE JORDAN, KLAUS	:
KLEINFELD, ANDREW N. LIVERIS,	:
ANNE MULCAHY, RICHARD D.	:
PARSONS, JUDITH RODIN, ROBERT E.	:
RUBIN, ROBERT E. RUBIN, FRANKLIN	:
A. THOMAS, JOHN DOES 1-20 (BEING	:
CURRENT AND FORMER MEMBERS	:
OF THE PLANS ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP INC.)	:
and JOHN DOES 21-40 (BEING	:
CURRENT AND FORMER MEMBERS	:
OF THE INVESTMENT COMMITTEE	:
OF THE CITIGROUP INC. 401(K) PLAN),	:
	:
Defendants.	:
-----X	

Civil Action No: 07 Civ. 10442

-----X
STEPHAN FIORINO, individually and on :
behalf of all others similarly situated, :

Plaintiff, :

v. :

Civil Action No: 07 Civ. 10458

CITIGROUP INC., CITIBANK N.A., :
CHARLES PRINCE, THE PLANS :
ADMINISTRATIVE COMMITTEE OF :
CITIGROUP INC., THE 401(k) :
INVESTMENT COMMITTEE, and :
JOHN DOES 1 - 20, :

Defendants. :

-----X
JAMES BOLLA, individually and on behalf :
of all others similarly situated, :

Plaintiff, :

v. :

Civil Action No: 07 Civ. 10461

CITIGROUP INC., CITIBANK N.A., :
CHARLES PRINCE, THE PLANS :
ADMINISTRATIVE COMMITTEE OF :
CITIGROUP INC., THE 401(k) :
INVESTMENT COMMITTEE, and :
JOHN DOES 1 - 20, :

Defendants. :

-----X
 MARK GEROULO, individually, on behalf :
 of the CITIGROUP 401(k) Plan, the :
 CITIBUILDER 401 (K) PLAN FOR :
 PUERTO RICO, and all others similarly, :

Plaintiff, :

v. :

Civil Action No: 07 Civ. 10472

CITIGROUP, INC., CITIBANK, N.A., :
 THE PLAN ADMINISTRATIVE :
 COMMITTEE OF CITIGROUP, INC., :
 MICHAEL E. SCHLEIN, JOHN DOES :
 1-10, THE CITIGROUP 401(k) PLAN :
 INVESTMENT COMMITTEE and JOHN :
 DOES 10-20, C. MICHAEL :
 ARMSTRONG, ALAN J.P. BELDA, :
 GEORGE DAVID, KENNETH T. DERR, :
 JOHN M. DEUTCH, ROBERTO :
 HERNANDEZ, ANN DIBBLE JORDAN, :
 ANDREW N. LIVERIS, DUDLEY C. :
 MECUM, ANNE M. MULCAHY, :
 RICHARD D. PARSONS, ANDRALL E. :
 PEARSON, CHARLES PRINCE, JUDITH :
 RODIN, ROBERT E. RUBIN, FRANKLIN :
 A. THOMAS, SANFORD I. WEILL, :

Defendants. :

-----X

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ALAN STEVENS, on Behalf of Himself	:
and All Others Similarly Situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CITIBANK, N.A,	:
CHARLES PRINCE, C. MICHAEL	:
ARMSTRONG, ALAIN J.P. BELDA,	:
GEORGE DAVID, KENNETH T. DERR,	:
JOHN M. DEUTCH, PETER JOHNSON,	:
ROBERTO HERNANDEZ RAMIREZ,	:
ANDREW N. LIVERIS, ANNE	:
MULCAHEY, RICHARD D. PARSONS,	:
JUDITH RODIN, ROBERT E. RUBIN,	:
ROBERT L. RYAN, FRANKLIN A.	:
THOMAS, THE PLANS	:
ADMINISTRATION COMMITTEE OF	:
CITIGROUP, INC., THE INVESTMENT	:
COMMITTEE and JOHN DOES 1-30,	:
	:
Defendants.	:
-----X	
STEPHEN GOLDSTEIN, on Behalf of	:
Himself and a Class of Persons Similarly	:
Situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., THE PLANS	:
ADMINISTRATION COMMITTEE OF	:
CITIGROUP, INC., MICHAEL E.	:
SCHLEIN, CHARLES PRINCE, C.	:
MICHAEL ARMSTRONG, ALAIN J.P.	:
BELDA, GEORGE DAVID, KENNETH T.	:
DERR, JOHN M. DEUTCH, ROBERTO	:
HERNANDEZ RAMIREZ, ANDREW N.	:
LIVERIS, ANNE MULCAHEY,	:
RICHARD D. PARSONS, JUDITH	:
RODIN, ROBERT E. RUBIN, ROBERT L.	:
RYAN, AND FRANKLIN A. THOMAS,	:
And JOHN DOES 1-30,	:
	:
Defendants.	:

Civil Action No: 07 Civ. 11156

Civil Action No: 07 Civ. 11158

-----X	
CHRIS SOUTHARD, on Behalf of All	:
Others Similarly Situated,	:
	:
Plaintiff,	:
	:
v.	:
	:
CITIGROUP INC., CHARLES O.	:
PRINCE, C. MICHAEL ARMSTRONG,	:
ALAIN J.P. BELDA, GEORGE DAVID,	:
KENNETH T. DERR, JOHN M. DEUTCH,	:
ROBERTO HERNANDEZ RAMIREZ,	:
ANN DIBBLE JORDAN, KLAUS	:
KLEINFELD, ANDREW N. LIVERIS,	:
ANNE MULCAHY, RICHARD D.	:
PARSONS, JUDITH RODIN, ROBERT E.	:
RUBIN, ROBERT E. RUBIN, FRANKLIN	:
A. THOMAS, JOHN DOES 1-20 (BEING	:
CURRENT AND FORMER MEMBERS	:
OF THE PLANS ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP INC.)	:
and JOHN DOES 21-40 (BEING	:
CURRENT AND FORMER MEMBERS	:
OF THE INVESTMENT COMMITTEE	:
OF THE CITIGROUP INC. 401(K) PLAN),	:
	:
Defendants.	:

Civil Action No: 07 Civ. 11164

 WILLIAM and PATRICIA WOODWARD, :
 Individually and On Behalf of All Others :
 Similarly Situated, :

Plaintiffs, :

v. :

Civil Action No: 07 Civ. 11207

CITIGROUP INC., CHARLES PRINCE, :
 ROBERT E. RUBIN, C. MICHAEL :
 ARMSTRONG, ALAIN J.P. BELDA, :
 GEORGE DAVID, KENNETH T. DERR, :
 JOHN M. DEUTCH, ROBERTO :
 HERNANDEZ RAMIREZ, ANDREW N. :
 LIVERIS, ANN MULCAHEY, RICHARD :
 D. PARSONS, JUDITH RODIN, ROBERT :
 L. RYAN, FRANKLIN A. THOMAS, ANN :
 DIBBLE JORDAN, KLAUS KLEINFELD :
 AND DUDLEY C. MECUM, and JOHN :
 and JANE DOES 1-10, :

Defendants. :

FRANCIA BRICK, individually and on :
 Behalf of all others similarly situated, :

Plaintiff, :

v. :

Civil Action No: 07 Civ. 11369

CITIGROUP INC., CHARLES PRINCE, :
 THE PLAN'S ADMINISTRATIVE :
 COMMITTEE OF CITIGROUP, INC., :
 THE 401(k) INVESTMENT COMMITTEE, :
 And JOHN DOES 1-10, :

Defendants. :

DECLARATION OF ROBERT A. IZARD

I, Robert A. Izard, declare as follows:

1. I am a Shareholder in the law firm Schatz Nobel Izard, P.C.
2. Attached hereto as Exhibit A is a true and correct copy of a transcript of the June 29, 2005 hearing in *In re AIG ERISA Litig.*, Master File No. 04-cv-9387 (JES) (AJP) (SDNY).
3. Attached hereto as Exhibit B is a true and correct copy of an order *In re AIG ERISA Litig.*, Master File No. 04-cv-9387 (JES) (AJP) (SDNY Aug. 3, 2005).
4. On November 29, 2007, I called Marian Rosner of Wolf Popper to request a copy of the *Tranberg* complaint. She told me that *Tranberg* was not her case and that I should call Jeff Squire of Brager Wexler. On November 30, I spoke with Mr. Squire who told me that he was out of the office and that I should call Ms. Rosner for the Complaint because *Tranberg* was actually Ms. Rosner's case.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 4th day of January, 2008.

_____/s/_____
Robert A. Izard